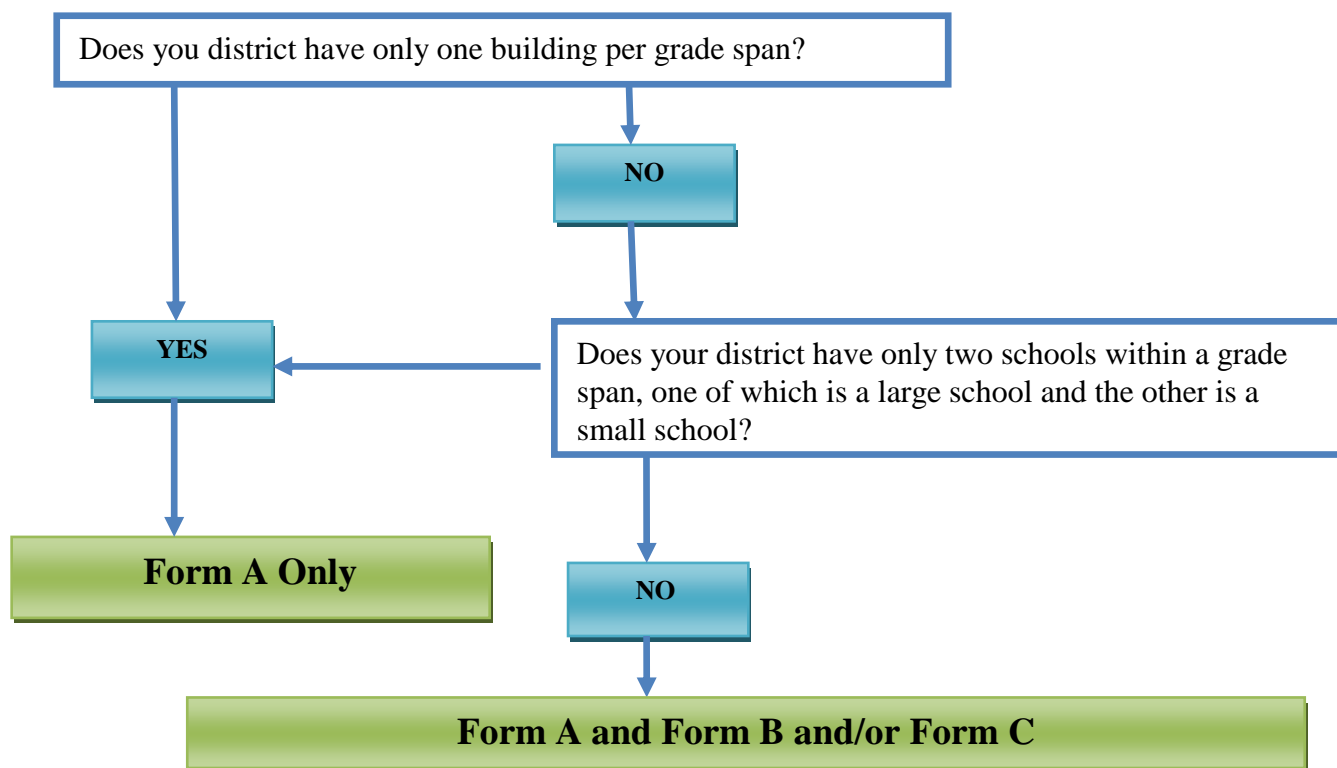
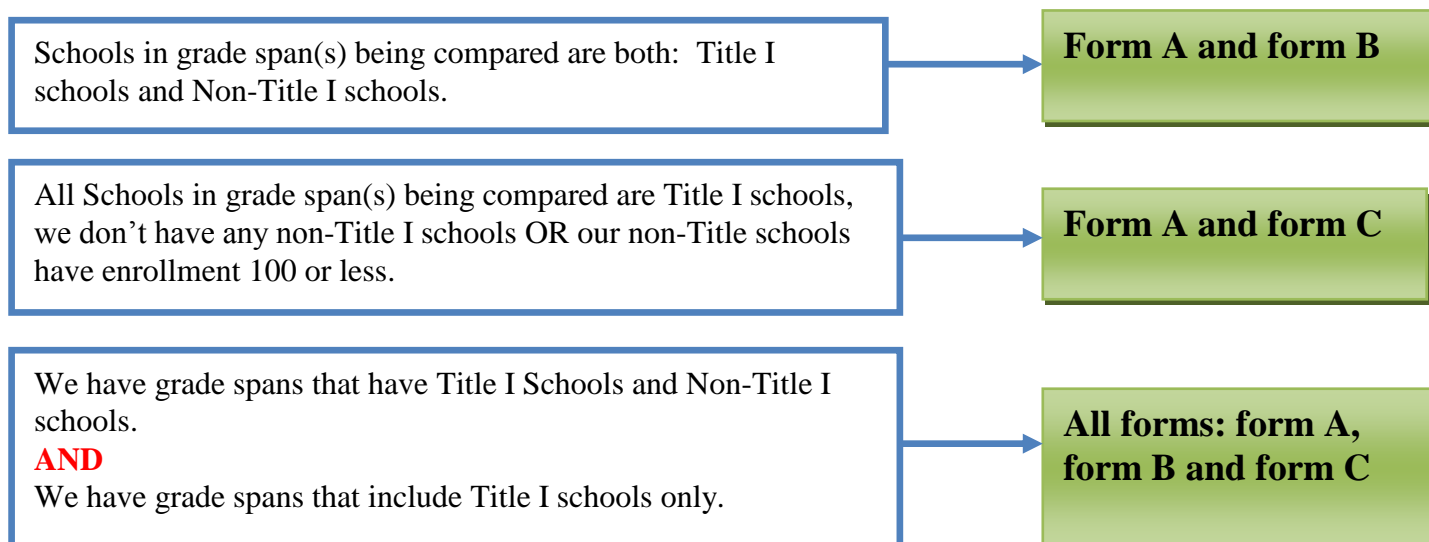


## What form should be used: A, B or C? Quick Reference Guide



**Is it form A, form B, form C or all?**

*Which of the following applies to your district?*



## What form should I be used: A, B or C?

### Detailed Reference Guide

**FORM A: Written Assurance of Comparability.** Copy, complete and submit as an email attachment.

- I.** Enter name and number of LEA.
- II.** **Grade Spans:** Comparability may be determined on a district-wide or grade span basis. LEAs must include charter schools that are schools within the LEA. The number of grade spans should match the basic organization of schools in the LEA. For example, if the LEA's organization includes elementary, junior high, and senior high schools, the LEA would have three grade spans (e.g. K-6, 7-9, 10-12). In a K-6 span, actual grade spans may be K-3, K-6, 4-6, etc. If an LEA has schools that overlap grade spans, they should be included in that group with which it has the most grades in common. Generally no more than three grade span groupings will be used; however, there are no limitations on the number of grade spans an LEA may use. Preschool should not be considered a grade-span. Schools with enrollments of less than 100 do not need to be included. *[Section 1120A(c)(4)]*

**Enrollment Size Range:** The range should show the smallest enrollment and the largest enrollment in the grade span. The LEA should enter all schools in the grade span in the smaller line, or has the option to divide the grade span into a small school group and a large school group. However, in order to divide the grade span into smaller/larger, there should be a significant difference in the enrollments of schools within the grade span. For example, the largest school in a grade span has an enrollment that is two times the enrollment of the smallest school in the grade span.

**Number of schools:** Record the number of Title I and non-Title I schools in each grade span and in each group according to size of enrollment. A separate Form B (comparing Title I schools and non-Title I schools) and/or Form C (comparing only Title I Schools) must be completed for each group of schools shown in Form A in which there are **both** Title I and non-Title I schools **or** more than one Title I school in any span. (Note: In rare cases LEAs may elect not to serve an eligible school that has a higher percentage of poverty than served schools with a lower percentage of poverty. If the LEA has met the requirements not to serve an eligible school with a higher percentage of poverty, any “skipped” Title I eligible school should be placed in the Title I pool rather than the non-Title I pool.)

- III.** If the table indicates the LEA is exempt (only one building per grade span **or** if an LEA has only two schools within a grade span, one of which is a large school and the other is a small school), save Form A and send as an email attachment to Elmira Feather at [efeather@sde.idaho.gov](mailto:efeather@sde.idaho.gov) Otherwise, complete Forms B and/or Form C (excel file from our website) before submitting all Forms.

**FORM B** – Comparing Title I Schools to Non-Title I Schools (Form C is to be used if all schools in a grade span are Title I schools.

Copy and save Form B as many times as necessary to calculate student/instructional staff ratio for each grade span from Form A.

**Sample data has been entered in some fields. Be sure to type over these samples with accurate data.**

**SECTION A:**

- Enter the LEA name and number.
- Identify the grade span the district is comparing in the boxes provided as reported on Form A.
- A separate Form B must be copied and prepared for each grouping of schools by grade span.

**SECTIONS B and C:**

**Column 1 – Schools:** Enter the names of all Title I and all non-Title I schools in the grade span being compared. Type over sample data. Insert rows if necessary.

**Column 2 – Actual grade span:** Enter the actual grade span for each school. (e.g., in a K-6 span, actual grade spans may be K-3, K-6, 4-6, etc.)

**Column 3 – Student enrollment:** Record the actual number of students enrolled in each school on the date being used for reporting (October 1<sup>st</sup>). Prorate if necessary because of exclusions or other reasons. (An LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.) Enter the data to the nearest tenth.

**Column 4 – FTE Instructional staff:** Enter the FTE staff to the nearest tenth as of October 1st. Include only staff paid with State and local funds. *[Section 1120A(c)(1)]* This would exclude staff paid with private or Federal funds. The LEA should consistently include the same categories of staff members in the ratios for both Title I and non-Title I schools. Instructional staff may include teachers and other personnel assigned to schools who provide **direct instructional services**, such as music, art, and physical education teachers, guidance counselors, speech therapists, and librarians, as well as other personnel who provide services that support instruction such as school social workers and psychologists. Whether paraprofessionals are included in comparability determinations depends on procedures the LEA has developed. Consistent with the requirement in Title I that a paraprofessional supported with Title I funds may only provide instructional support under the direct supervision of a teacher, we urge LEAs to consider carefully whether a paraprofessional supported with State and local funds should be considered equivalent to a teacher or other instructional staff member in comparability determinations. If the LEA determines to include paraprofessionals, we suggest that paraprofessionals who assist in the instruction of students only be counted as half of a teacher. In addition, an LEA should take care not to include aides not involved in providing instructional support in its comparability determinations.

How are school personnel who are paid with State Fiscal Stabilization funds treated in determining comparability?

In light of the wide variety of activities for which State Fiscal Stabilization Funds may be used, the determination of whether they are treated as Federal funds or State or local funds for purposes of comparability determinations should be made in consideration of the particular activity for which the funds are being used. Under section 14003(a) of the American Recovery and Reinvestment Act of 2009 (ARRA), State Fiscal Stabilization Funds may be used for any activity that is authorized by the ESEA, the Individuals with Disabilities Education Act (IDEA), the Adult and Family Literacy Act, or the Carl D. Perkins Career and Technical Education Act of 2006, among other certain specified activities. The activities authorized by the ESEA include activities that are authorized by Title VIII of the ESEA, the Impact Aid Program. Because Impact Aid is considered general aid to recipient LEAs, Impact Aid funds may be used for any educational activity

consistent with local and State requirements. As such, Impact Aid funds are effectively deemed State and local funds for which no accountability to the Federal government is required, and staff that are paid with Impact Aid funds are included in comparability determinations.

Accordingly, if school personnel are paid with State Fiscal Stabilization Funds on the basis that the funds are being used for activities that are authorized by Impact Aid — *i.e.*, the funds are being used to pay school personnel who would ordinarily be supported with State or local funds in the absence of the current economic conditions — then the school personnel should be considered to be paid with State or local funds and should be included in comparability determinations. If, however, school personnel are paid with State Fiscal Stabilization Funds for activities that are authorized by one of the other Federal programs set forth above — *e.g.*, in the absence of the State Fiscal Stabilization Funds, the staff member would otherwise be paid with IDEA funds — then the individual paid with those funds should be considered to be Federally funded and should not be included in comparability determinations.

An LEA must include an explanation of how it treats State Fiscal Stabilization Funds-paid staff in the comparability procedures it is required to develop under section 1120A(c)(3)(A) of the ESEA.

**Column 5 - Student/instructional staff ratio:** this is formula driven and will automatically calculate.

**Column 6 - Comparable:** Comparability determination is formula driven and automatically calculates. In order to be comparable, the student/instructional staff ratio for each Title I school may not exceed 110% of the average of the non-Title I schools. If any schools are not comparable, the LEA must find another method of meeting comparability requirements. (Return to Form A to determine if the LEA could split a grade span into smaller/larger groups.) Or, for additional methods of determining comparability, please visit:

<http://www.ed.gov/programs/titleiparta/fiscalguid.doc>.

## **FORM C – All Schools in Grade Span are Title I Schools**

**SECTION A:** Enter district name and the grade span the district is comparing. A separate Form C must be prepared for each grouping of schools by grade span. Identify the grade span in the box provided as reported on Form A. (If you have more than one group from Form A to compare, please copy Form C as many times as necessary.)

### **SECTIONS B and C:**

**Column 1 – Schools:** Enter the names of all Title I schools in the grade span from Form A. Insert rows if necessary.

**Column 2 – Actual grade span:** Enter the actual grade span for each school. (e.g., in a K-6 span, actual grade spans may be K-3, K-6, 4-6, etc.)

**Column 3 – Student enrollment:** Record the actual number of students enrolled in each school on the date being used for reporting (October 1<sup>st</sup>). Prorate if necessary because of exclusions or other reasons. (An LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.) Enter the data to the nearest tenth.

**Column 4 – FTE Instructional staff:** Enter the FTE staff to the nearest tenth as of October 1st. Include only staff paid with State and local funds. *[Section 1120A(c)(1)]* This would exclude staff paid with private or Federal funds. The LEA should consistently include the same categories of staff members in the ratios for all schools. Instructional staff may include teachers and other personnel assigned to schools who provide **direct instructional services**, such as music, art, and physical education teachers, guidance counselors, speech therapists, and librarians, as well as other personnel who provide services that support instruction such as school social workers and psychologists. Whether paraprofessionals are included in comparability determinations depends on procedures the LEA has developed. Consistent with the requirement in Title I that a paraprofessional supported with Title I funds may only provide instructional support under the direct supervision of a teacher, we urge LEAs to consider carefully whether a paraprofessional supported with State and local funds should be considered equivalent to a teacher or other instructional staff member in comparability determinations. If the LEA determines to include paraprofessionals, we suggest that paraprofessionals who assist in the instruction of students only be counted as half of a teacher. In addition, an LEA should take care not to include aides not involved in providing instructional support in its comparability determinations.

**Column 5 - Student/instructional staff ratio:** This is formula driven and will automatically calculate.

**Column 6 - Comparable:** Comparability determination is formula driven and automatically calculates. Schools are comparable if the student/instructional staff ratio for each school falls within a range that is between 90 and 110 percent of the average for all schools. If any schools are not comparable, the LEA must find another method of meeting comparability requirements. (Return to Form A to determine if the LEA could split a grade span into smaller/larger groups.) Or, for additional methods of determining comparability, please visit: <http://www.ed.gov/programs/titleiparta/fiscalguid.doc>.